

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

VIRTAMOVE, CORP.,	§	
<i>Plaintiff,</i>	§	
	§	
v.	§	CIVIL ACTION 2:24-cv-00093-JRG
	§	(LEAD CASE)
HEWLETT PACKARD ENTERPRISE	§	
COMPANY,	§	<b>JURY TRIAL DEMANDED</b>
<i>Defendant.</i>	§	
	§	
	§	
	§	
VIRTAMOVE, CORP.,	§	
<i>Plaintiff,</i>	§	
	§	
v.	§	CIVIL ACTION 2:22-cv-00064-JRG
	§	(MEMBER CASE)
INTERNATIONAL BUSINESS	§	
MACHINES CORP.,	§	<b>JURY TRIAL DEMANDED</b>
<i>Defendant.</i>	§	
	§	
	§	
	§	

**NOTICE OF SUBMISSION OF  
PROPOSED REDACTIONS TO SEALED ORDER**

Pursuant to the Court’s February 5, 2025 Sealed Memorandum Opinion and Order (Dkt. 130, the “Sealed Order”), the parties have conferred for the purpose of generating an appropriately redacted public version of the Sealed Order.

Defendant Hewlett Packard Enterprise Company (“HPE”) respectfully requests that the Court maintain under seal the redacted portions (denoted by black boxes) of the redacted version of the Sealed Order attached as Exhibit A hereto. Plaintiff VirtaMove, Corp. does not oppose HPE’s request.

Dated: February 13, 2025

By: /s/ Katharine Burke

Jennifer H. Doan  
Texas Bar No. 08809050  
Joshua R. Thane  
Texas Bar No. 24060713  
HALTOM & DOAN  
6500 Summerhill Road, Suite 100  
Texarkana, TX 75503  
Telephone: (903) 255-1000  
Facsimile: (903) 255-0800  
Email: jdoan@haltomdoan.com  
Email: jthane@haltomdoan.com

Katharine Burke (Lead Attorney)  
DC Bar Number: 985333  
Katharine.burke@bakerbotts.com  
**BAKER BOTTs L.L.P.**  
700 K Street, N.W.  
Washington, DC 20001-5692  
Tel: (202) 639-7700  
Fax: (202) 639-7890

Douglas M. Kubehl  
Texas Bar No. 00796909  
Doug.kubehl@bakerbotts.com  
Morgan Mayne  
Texas Bar No. 24084387  
Morgan.mayne@bakerbotts.com  
Emily Deer  
Texas Bar No. 24116352  
**BAKER BOTTs L.L.P.**  
2001 Ross Avenue, Suite 900  
Dallas, TX 75201-2980  
Tel: (214) 953-6500  
Fax: (214) 953-6503

David Lien (*pro hac vice*)  
California Bar No. 313754  
David.lien@bakerbotts.com  
**BAKER BOTTs L.L.P.**  
1001 Page Mill Road, Building One,  
Suite 200  
Palo Alto, CA 94304-1007  
Tel: (650) 739-7563  
Fax: (650) 739-7663

***ATTORNEYS FOR DEFENDANT  
HEWLETT PACKARD ENTERPRISE  
COMPANY***

**CERTIFICATE OF SERVICE**

I hereby certify that Counsel of record who are deemed to have consented to electronic service are being served on February 13, 2025, with a copy of this document via the Court's CM/ECF System.

By: /s/ Katharine Burke  
Katharine Burke